

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

In re: §  
VENTECH ENGINEERS LP et al., §  
Debtors,<sup>1</sup> §  
RODNEY D. TOW, CHAPTER 7 §  
TRUSTEE FOR THE ESTATE OF §  
VENTECH ENGINEERS §  
INTERNATIONAL, LLC, §  
Plaintiff, §  
v. §  
404 NOTFOUND, INC., f/k/a FUELFX, §  
INC., f/k/a FUELFX, LLC, d/b/a §  
FUEL FX, §  
Defendant. §

Case No. 17-33203

Jointly Administered

Adversary No. 19 - 03485

**REQUEST FOR ENTRY OF DEFAULT**

Plaintiff Rodney D. Tow (the “Plaintiff” or “Trustee”) in his capacity as the Chapter 7 Trustee for the Chapter 7 Estate of Ventech Engineers International, LLC (the “Debtor”), by and through his counsel, Diamond McCarthy LLP, respectfully requests that the Clerk of the Court enter default against the Defendant 404 notfound, Inc., f/k/a FuelFx, Inc., f/k/a FUELFX, LLC, d/b/a Fuel FX, pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, made applicable to this adversary proceeding by Rule 7055 of the Federal Rules of Bankruptcy Procedure, for failure to plead or

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<sup>1</sup> The names of the debtors in these chapter 7 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Ventech Engineers L.P. (0943); Ventech Engineers LLC (7644); Ventech Fabrication Services LLC (6482); Ventech Engineers International LLC (5030); Ventech Energy LLC (1829); Ventech Engineers North America LLC (7325); Ventech Engineers USA LLC (7499); Ventech Vessel Fabricators LLC (6525); Ventech Global Projects, Inc. (9146); Ventech International Projects LLC (2187); Ventech Global Construction, LLC (0736); Ventech Modular Fabricators LLC (2960); Ventech Refining Solutions LLC (6454); Ventech Plant Constructors LLC (5107); Ventech Engineers & Fabricators, LLC (2106); Ventech Industrial Contractors, LLC (6482); Ventech XTL LLC (2500); and Ventech XTL Oklahoma City LLC (5549).

otherwise defend the above-captioned action as fully appears from the Court file and from the attached affidavit.

Dated: November 21, 2019

Respectfully submitted,

DIAMOND MCCARTHY LLP

/s/Charles M. Rubio

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*Counsel to Chapter 7 Trustee Rodney D. Tow*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing *Request for Entry of Default* was served by first class United States mail and U.S. Certified First Class Mail (return receipt requested) on November 21, 2019 to the following:

404notfound, Inc. c/o Oliver O. Diaz, its registered agent,	404notfound, Inc. c/o Oliver Diaz, its governing person,	404notfound, Inc. 3831 Golf Dr. Houston, TX 77018	Oliver O. Diaz 5471 Kuldell Dr. Houston, TX 77096
1811 Bering Dr. Ste. 450 Houston, TX 77057	526 Kingwood Dr. 341 Kingwood, TX 77339		

/s/Charles M. Rubio

Charles M. Rubio